



Montana Department of
ENVIRONMENTAL QUALITY

MAILED
9-17-09 JH

Brian Schweitzer, Governor

P.O. Box 200901 • Helena, MT 59620-0901 • (406) 444-2544 • www.deq.mt.gov

September 16, 2009

Mr. William Spoja
SANITATION INC.
P.O. Box 882
Lewistown, MT 59457-0882

RE: **CLOSED SANITATION, INC. LANDFILL – FERGUS COUNTY – LICENSE #291**
REVISED GROUNDWATER SAMPLING AND ANALYSIS PLAN FIGURES, SEPTEMBER 2009

Dear Mr. Spoja:

The Department has reviewed the September 2009 revised figures for the Groundwater Sampling and Analysis Plan (SAP) dated November 2007 for the closed Sanitation, Inc. Class II Landfill in Lewistown, Fergus County, Montana. The SAP is approved by the Department and will be included in our files. Please use this SAP as the guidance document for all future sampling events.

If you have any questions or comments regarding this review, please contact me at the Permitting and Compliance Division, Waste and Underground Tank Management Bureau, Solid Waste Section.

Sincerely,

Martin Van Oort
Environmental Science Specialist
Solid Waste Program
Phone: 406-444-2802, Fax: 406-444-1374
E-mail: mvanoort@mt.gov

File: Closed\Fergus Co.\Sanitation, Inc. Class II Landfill\License #291\Ground Water Reports
Path: G:\WUT\SWS\GWater\Responses\Fergus Co\2008-09_sanitation_inc_SAP.doc
cc: Mr. Barry Damschen, Barry Damschen Consulting, 5531 York Road, Helena, MT 59602
Mr. Mark Walker, Hydrometrics, Inc., 3020 Bozeman Ave, Helena, MT 59601

MAILED

Correspondence Slip

Project ID: _____

Requested: 9/14/09Needed By: 9/16/09Originator: MVO

Org(s)/Mail Code: _____

REVIEW
ROUTING

Name

Task

Initial/Date

AdminProofSh, 9-14Mary HReviewneh, 9-15DorellReviewDas, 9/15RickReviewRT, 9-16-09

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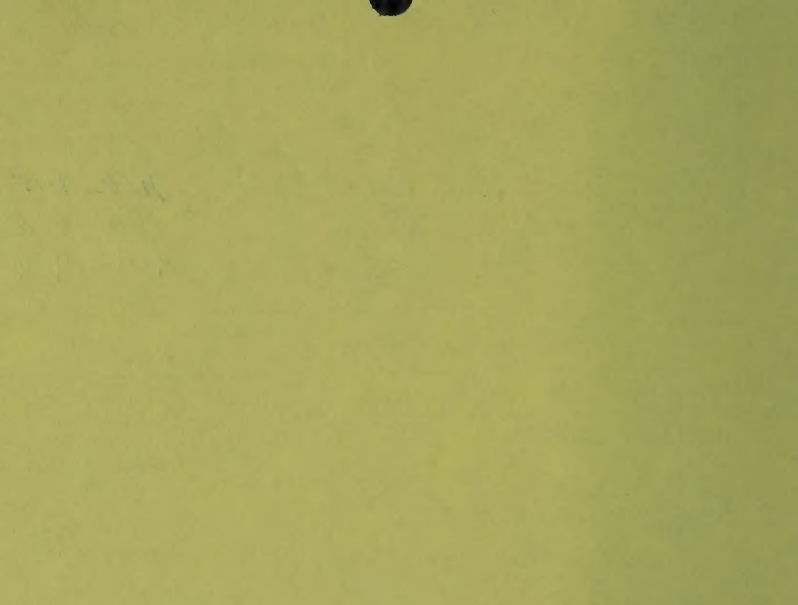
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Special Instructions:

Copies of enclosures
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Montana Department of

ENVIRONMENTAL QUALITY

MEMO

TO: Solid Waste Files
Closed\Fergus Co.\Sanitation Inc.\Lic. #291\Groundwater Reports

FROM: Martin Van Oort, Hydrogeologist – Solid Waste Section

DATE: April 25, 2013

SUBJECT: **Summary of Groundwater Monitoring at Closed Sanitation Inc. Landfill, License #291**

Groundwater monitoring at the Sanitation Inc Landfill has been conducted since 1995 and has shown low-level VOC contamination since the initiation of monitoring. The primary constituents detected were initially CFCs and 1,1,1-Trichloroethane, but BTEX compounds and chlorinated solvents have been detected more recently. In particular the June 2012 sampling event detected several VOCs not previously detected at the facility including Tetrachloroethene and Vinyl chloride. Vinyl chloride exceeded the DEQ-7 HHS of 0.2, although it did not exceed the DEQ-7 RRV of 0.4.

General groundwater quality at the facility showed a change beginning around 2004-2005, with increases in several inorganic parameters, particularly in well SIMW-4, and increased detections of VOCs. Because of ongoing legal issues regarding closure and post-closure at the facility, Sanitation Inc. has never been required to begin an assessment monitoring program, although assessment monitoring is justified by the statistically significant exceedances of background concentrations, and the detection of VOC contamination. Sanitation Inc. currently monitors groundwater annually in detection monitoring status.

If the chlorinated solvent detections from June 2012 prove persistent in June 2013, semi-annual assessment monitoring will likely be necessary. Current post-closure care financial assurance funding is insufficient to pay for assessment monitoring, or even semi-annual detection monitoring. Because of these financial considerations and previous legal actions between the owner of the facility and the DEQ, initiation of assessment monitoring will likely be a difficult process and require additional legal action.

EXHIBIT 10

NAME	DATE
ADDRESS	DATE
CITY	DATE
STATE	DATE
ZIP	DATE

FILE TYPE	PAGES	DATE	FROM	TO	RE
GW Reports-Sec.2	1	07/31/03	Bruce Siegmund	Pat Crowley	E-mail re: SAP testing
GW Reports-Sec.2	multiple	01/01/95	Damschen & Associates	Sanitation, Inc	Work plan for the Sanitation, Inc. Landfill

"	"	4/7/95	"	"	Suppl. Hydro Soils Rpt.
"	"	4/11/95	"	"	Well Logs
"	"	1/2/96	"	Pat Potts	Groundwater Rpt.

Location	Time	Notes	Remarks
Well logs	4/11/02	"	"
Gravel pits Right	4/12/02	"	"
Gravel pits Left	4/13/02	"	"

Crowley, Patrick

From: Bruce Siegmund [BSiegmund@Entranco.com]
Sent: Thursday, July 31, 2003 1:14 PM
To: 'Crowley, Patrick'
Subject: RE: Sanitation, Inc.

Yes, standard operating procedure, Pat Potts was out there for one sampling visit, if that's useful info. It seems to me that we were prepping to submit an SAP at the same time we revised the others but ran into some contractual snags and it never got off the ground.

-----Original Message-----

From: Crowley, Patrick [mailto:pcrowley@state.mt.us]
Sent: Thursday, July 31, 2003 12:02 PM
To: 'Bruce Siegmund'
Subject: RE: Sanitation, Inc.

Thank you very much. That is the same result from our file search. We are assuming you just used your standard sampling protocol.

Pat

-----Original Message-----

From: Bruce Siegmund [mailto:BSiegmund@Entranco.com]
Sent: Thursday, July 31, 2003 11:48 AM
To: 'pcrowley@state.mt.us'
Subject: Sanitation, Inc.

Pat,

I'm not finding any evidence of an SAP at Sanitation. I can track down all of the site investigations and so forth, but there's not an SAP per se. I'm thinking that there may have been a groundwater monitoring plan included in one of the technical submittals, but that would be about the only thing on paper that I can suggest.

Bruce

Bruce Siegmund
Senior Hydrogeologist

Entranco
PO Box 4817
Helena, MT 59601

406-449-8627 ext. 115
406-449-8631 fax

bsiegmund@entranco.com

Chronic Pain

From: [redacted]@gmail.com

Date: Thursday, July 27, 2012, 1:14 PM

To: [redacted]

Subject: Re: Chronic Pain

The chronic pain is a very real and debilitating condition. It is not just a physical pain, but it is also a mental and emotional pain. It is a pain that can be felt in every part of the body, and it can be felt in every part of the mind. It is a pain that can be felt in every part of the soul, and it can be felt in every part of the heart. It is a pain that can be felt in every part of the body, and it can be felt in every part of the mind. It is a pain that can be felt in every part of the soul, and it can be felt in every part of the heart.

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-----Original Message-----

From: [redacted]@gmail.com

Sent: Thursday, July 27, 2012, 12:12 PM

To: [redacted]

Subject: Re: Chronic Pain

Thank you for your email. I am sorry to hear that you are experiencing chronic pain. It is a very real and debilitating condition, and it can be very difficult to live with. I am glad that you are seeking help, and I am glad that you are reaching out to me. I will do my best to help you, and I will do my best to provide you with the information that you need.

-----Original Message-----

From: [redacted]@gmail.com

Sent: Thursday, July 27, 2012, 11:14 AM

To: [redacted]

Subject: Re: Chronic Pain

I am sorry to hear that you are experiencing chronic pain. It is a very real and debilitating condition, and it can be very difficult to live with. I am glad that you are seeking help, and I am glad that you are reaching out to me. I will do my best to help you, and I will do my best to provide you with the information that you need.

Best,

[redacted]

[redacted]

Chronic Pain

Re: Chronic Pain

From: [redacted]

Sent: Thursday, July 27, 2012, 1:14 PM

To: [redacted]

Subject: Re: Chronic Pain